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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HON. JANIS L. SAMMARTINO)

UNITED STATES OF AMERICA, Plaintiff, v. LUIS ALBERTO BRAVO-GONZALEZ, Defendant.	)	CASE NO. 07CR3157-JLM DATE: December 21, 2007 TIME: 9:00 a.m. NOTICE OF MOTIONS AND MOTIONS TO: (1) PRESERVE EVIDENCE AND COMPEL PRODUCTION OF DISCOVERY; AND (2) GRANT LEAVE TO FILE FURTHER MOTIONS.

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY;
STEVEN DESALVO, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on December 21, 2007 at 9:00 a.m., Luis Alberto Bravo-Gonzalez, by and through his attorneys, Shaffy Moeel and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions:

(1) compelling discovery and preservation of evidence; and

(2) granting leave to file further motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

Dated: December 20, 2007

/s/ Shaffy Moeel
SHAFFY MOEEL
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Bravo-Gonzalez